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VIA FACSIMILE COMMUNICATION/FEDERAL EXPRESS

Peter Mannino
Project Manager
U.S. Environmental Protection Agency – Region 2
Emergency and Remedial Response Division
290 Broadway
New York, NY 10007

Re: Operable Unit 2 (OU2) Feasibility Study for the
Cornell-Dubilier Electronics Superfund Site ("Site")
South Plainfield, New Jersey

Dear Pete:

You will be receiving under separate cover a letter from Mark Nielsen of ENVIRON setting forth comments by Dana Corporation ("Dana") and Cornell-Dubilier Electronics, Inc., as the Hamilton Industrial Park Group ("HIPG"), with respect to the EPA's Remedial Alternatives Screening Memorandum. Mark's letter emphasizes our view that, given the circumstances at the Hamilton Industrial Park Site, an appropriately designed containment remedy would effectively address the risks identified in EPA's Remedial Investigation Report and satisfy both the applicable ARARs and EPA's relevant guidance documents.

However, I note that EPA's Remedial Alternative Screening Memorandum evidences a concern that certain of the more significantly contaminated areas of the Site may require treatment, with a particular focus on the use of solidification/stabilization technologies. Given EPA's discussion of proposed treatment alternatives, Dana asked ENVIRON to review the Alternatives Screening Memorandum and advise us regarding whether there may be an appropriate approach employing solidification/stabilization that could cost-effectively address the principal threat material at the Hamilton Industrial Park Site, while at the same time, being consistent with the planned Site redevelopment.

In the above-referenced letter submitted by ENVIRON on behalf of HIPG, it is emphasized that several site-specific factors will affect the remedy selection for OU2, and that there are potentially significant feasibility questions that EPA must consider if it is evaluating

employing a large scale, intrusive excavation remedy or a "one size fits all" treatment technology for the Site, like solidification/stabilization. Moreover, in reviewing the Remedial Alternatives Screening Memorandum, the HIPG is seriously concerned that EPA had not fully considered how each of the identified remedial measures could impact the surrounding community, on-site workers, and future beneficial reuse of the Site.

In response to Dana's request, ENVIRON identified several site-specific factors that we believe should be carefully considered as the Feasibility Study (FS) progresses:

- Physical and chemical heterogeneity of on-site soils: The evaluated alternatives should address the observations and data reported from the OU2 Remedial Investigation (RI). Overburden materials at the Site include man-made fill (gravel, cinders, ash, slag), debris (brick, glass fragments, wood, metal fragments, capacitors), and floodplain soils.

- Limitations of a single remedial technology to address physical and chemical heterogeneities: Aside from capping the contaminated soils, it may be impractical to identify a single cost-effective process to address the heterogeneous soils which include a combination of metals, VOCs, SVOCs and/or PCBs, in addition to debris fill material. In addition, given the heterogeneneity and volume of soils that may require remediation, the overall risk to human health and the environment resulting from implementing a large-scale intrusive remedial alternative should be carefully considered.

- Potential volume of soils in Area A and Area B: In the OU2 risk assessment, the two areas identified for risk characterization were based on surfical distinctions between currently active and inactive portions of the Site, and do not provide a refined assessment based on the actual distribution of physically different materials identified at the site (e.g., areas of contaminated soil versus areas of contaminated soil, debris and other fill).

- Identifying constituents and pathways that are above EPA's acceptable risk range, based on the OU2 Risk Assessment: As presented on the OU2 RI Report, the soil exposure pathways contributing to cumulative risks exceeding the acceptable risk range are primarily dermal contact, ingestion and particulate inhalation from exposed surface soils.

Based on the site-specific factors relating the heterogeneous nature of the OU2 soils, the large volume of soil identified in the OU2 risk assessment as potentially requiring remediation, and the primary pathways contributing to the unacceptable site-related risks, and taking into consideration EPA's guidance, policies and precedents for addressing sites with large volumes of heterogeneous materials, ENVIRON, at Dana's request, has developed the following remedial alternative for consideration, should EPA decide that capping alone is not acceptable to address principal threats at the Site.

- Delineate Limits for Principal Threat Material: Define the limits of soil contamination that could be considered "principal threat" material based on a sample-by-sample assessment to identify areas where concentrations yield excess cancer risks higher than 10^{-2} or represent a HI higher than 100 (i.e., at least two orders of magnitude higher than the acceptable levels).[1]

- Treat Primary Pathways of Exposure to OU2 Principal Threat Materials: Based on the primary pathways of concern identified in the OU2 risk assessment (i.e., direct exposures to surface soils and inhalation of particulates from surface soils), the surface soils (0 to 2 feet) in the delineated area of principal threat materials should be considered for treatment to minimize the toxicity and/or mobility (via airborne emissions) of these soils. This treatment may include solidification/stabilization technologies currently being evaluated by EPA for this OU2 soils. In areas where principal threat levels are limited to the upper 2-feet or cannot otherwise be treated in-situ (e.g., floodplain soils), these surface soils could be treated ex-situ and then consolidated into the larger on-site area(s) which have been subjected to treatment. These solidified/stabilized surface soils would form a 2-foot thick hardened layer over the subsurface soils within the principal threat areas, thereby enhancing the reliability of the containment of the deeper soils.

- Contain Treated Soils and Lower Long-Term Risk Soils: For the remaining areas of OU2 soils, evaluate appropriate containment designs, including use of redevelopment components (pavement, building slabs, vegetative covers) to address soils presenting lower level risks via direct contact and/or particulate emission exposure pathways. These containment components would also extend over the treated principal threat soils to further minimize the potential for disturbance of these materials.

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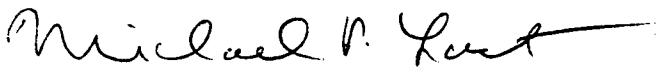
[1] According to EPA's *A Guide to Principal Threat and Low Level Threat Wastes* (1991), "principal threat wastes are those source materials [including contaminated soil] considered to be highly toxic or highly mobile which generally cannot be contained in a reliable manner and/or would present a significant risk to human health or the environment should exposure occur." EPA has not established an absolute threshold level of risk for identifying principal threat materials. However, as discussed in the *Rules of Thumb for Superfund Remedy Selection* (1997) EPA considers principal threat as "those source materials with toxicity and mobility characteristics that combine to pose a potential risk *several orders of magnitude* greater than the risk level that is acceptable for the current or reasonably anticipated future land use, given realistic exposure scenarios" (emphasis added).

As defined by EPA, acceptable risk levels are cumulative excess cancer risk to an individual based on reasonable exposure for both current and reasonably expected future land use of 10^{-4} or less, and a noncancer hazard index (HI) of 1 or less (EPA 1991). Therefore, contaminated soil that poses a cumulative excess cancer risk higher than 10^{-2} or represents a HI higher than 100 (i.e., at least two (i.e. "several") orders of magnitude higher than the acceptable levels) may be identified as a principal threat material for which treatment could be considered. Conversely, contaminated soil that poses cumulative excess cancer risk lower than 10^{-2} or represents a HI lower than 100 may be considered as low-level threat material for which containment would be appropriate.

As outlined above, this remedial approach combines both elements of treatment and containment to eliminate the primary exposure pathways identified in the OU2 risk assessment and to address USEPA's preference for treatment of principal threat material as defined based on these primary exposure pathways. Further, this remedial approach incorporates as an integral element the planned redevelopment of the Site as recommended under EPA's Superfund Redevelopment Initiative (SRI) and in EPA's guidance on the reuse of Superfund sites for commercial use.

It must be emphasized that Dana Corporation still believes that containment is not only acceptable, but a very effective means of managing the Site in light of successful precedents such as the Raymark Industries Site in Stratford, Connecticut, which was an EPA lead cleanup, and the Norwood PCB Site in Norwood, Massachusetts. However, within the context of the potential range of treatment alternatives, Dana is willing to discuss with EPA and the other PRPs at the Hamilton Industrial Park Site the possibility of implementing a remedial approach such as that which is outlined in this letter. Any such discussion must be interactive among the parties, so that the remedial approach can be appropriately targeted, made cost-effective, and support the redevelopment plans for the Site. Therefore, we look forward to speaking with you further regarding the issues raised in this letter.

Yours sincerely,



Michael P. Last

cc: Sarah P. Flanagan, Esquire
Lisa A. Wurster, Esquire
Kim Stollar, Esquire
Mark Nielsen